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VIA email: Richard.Chavez@usda.gov

March 7, 2006

Director, Commodity Procurement Policy & Analysis Division
Farm Service Agency, US Department of Agriculture
Rm. 5755-S
1400 Independence Avenue, SW
Washington, DC 20250-0512

Re: CCC Proposed Rule on Procurement of Commodities for Foreign Donation

Dear Sir or Madame:

On behalf of the PL 480 Subcommittee of the International Food Additives Council (IFAC), these comments are submitted in response to the above referenced proposed rule published by the Commodity Credit Corporation (CCC) in the December 16, 2005 Federal Register (70 FR 74717-21). IFAC's PL 480 Subcommittee is composed of companies who manufacture and supply minerals that are utilized to nutritionally fortify several commodities procured by CCC for foreign donation. IFAC supports the change in procurement policy of commodities for foreign donation as outlined by CCC in the proposed rule.

The proposed rule would require firm, fixed freight rates and availability to be submitted to CCC that would be used in export food aid commodity purchases, and in subsequent freight bookings. CCC indicates that the proposal will streamline its food aid procurement process and allow for more efficient acquisition of food aid commodities. We agree with CCC's analysis and believe that the resultant efficiencies will achieve overall cost savings in the purchase and overseas delivery of commodities to these valuable food aid programs. And, the budget savings realized from implementing the proposal can then be used to procure and deliver more foods to meet the humanitarian purpose of these programs. The proposed rule will benefit not only overseas commodity recipients, but also US farmers, packagers, processors, and other entities that participate in the export food aid programs.

Again, IFAC supports the rule as proposed. We appreciate the opportunity to be able to submit these comments.

Sincerely,

Lyn O'Brien Nabors

Lyn O'Brien Nabors
President

